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UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

**STATE OF CALIFORNIA, by and through  
Attorney General Xavier Becerra;  
COUNTY OF LOS ANGELES; CITY OF  
LOS ANGELES; CITY OF FREMONT;  
CITY OF LONG BEACH; CITY OF  
OAKLAND; CITY OF STOCKTON,**

Plaintiffs,

**v.**

**WILBUR L. ROSS, JR., in his official  
capacity as Secretary of the U.S.  
Department of Commerce; U.S.  
DEPARTMENT OF COMMERCE; DR.  
STEVEN DILLINGHAM, in his official  
capacity as Director of the U.S. Census  
Bureau; U.S. CENSUS BUREAU; DOES 1-  
100,**

Defendants.

No. 3:18-cv-01865-RS

**STIPULATION TO FURTHER  
ENLARGE TIME RE: ATTORNEYS'  
FEES AND COSTS; ~~PROPOSED~~  
ORDER**

Dept: 3  
Judge: The Honorable Richard G.  
Seeborg  
Trial Date: January 7, 2019  
Action Filed: March 26, 2018

1 Plaintiff State of California, Plaintiff-in-Intervention Los Angeles Unified School District  
2 (LAUSD and, collectively, “Plaintiffs”), and Defendants Wilbur L. Ross, Jr., U.S. Department of  
3 Commerce, Dr. Steven Dillingham, and U.S. Census Bureau (collectively, “Defendants,” and  
4 together with Plaintiffs, the “Parties”), by and through their respective attorneys of record,  
5 stipulate as follows:

6 1. Following entrance of the initial judgment in this case, the Parties stipulated, and this  
7 Court ordered, that Plaintiffs’ deadline to file any motion for attorneys’ fees or bill of costs was  
8 extended until after Defendants’ appeal was resolved and a final judgment was entered. *See* ECF  
9 Nos. 212, 213.

10 2. This Court entered Final Judgment After Remand, Order of Vacatur, and Permanent  
11 Injunction on August 1, 2019. Pursuant to the previous stipulation and order, the deadline to file  
12 a motion for attorneys’ fees was then September 3, 2019. *Id.*

13 3. Plaintiff State of California and Plaintiff-in-Intervention LAUSD filed their bills of  
14 costs on August 15 and 16, 2019, respectively. ECF Nos. 241, 243. Defendants’ deadlines to file  
15 objections to the bills of costs were initially August 29 and 30, 2019. *See* Local Rule 54-2.

16 4. Pursuant to prior stipulations filed by the parties on August 27, 2019 (ECF No. 244),  
17 September 11, 2019 (ECF No. 246), and September 26, 2019 (ECF No. 248), the Court extended  
18 Plaintiffs’ deadline to file any motion for attorneys’ fees and Defendants’ deadlines to file any  
19 objections to October 11, 2019, to all the Parties to discuss the possibility of settlement on the  
20 issues of attorneys’ fees and costs.

21 5. The Parties are in the process of memorializing a settlement agreement. In order to  
22 finalize the agreement, the Parties jointly request a further seven-day extension to October 18,  
23 2019, for: 1) the deadline to file any motion for attorneys’ fees; and 2) the deadline to file  
24 objections to Plaintiffs’ filed bills of costs.

25 6. This requested time modification would not have any effect on the schedule for this  
26 case, other than slightly delaying any potential attorneys’ fees and costs proceedings.

1           **IT IS SO STIPULATED.**

2           Dated: October 10, 2019

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Supervising Deputy Attorney General  
GABRIELLE D. BOUTIN  
Deputy Attorney General

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6           /s/ R. Matthew Wise  
R. MATTHEW WISE  
Deputy Attorney General  
Attorneys for Plaintiff State of California, by and  
through Attorney General Xavier Becerra

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8  
9           Dated: October 10, 2019

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SUE ANN SALMON EVANS  
KEITH A. YEOMANS

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11           /s/ Keith A Yeomans  
Keith A. Yeomans  
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Los Angeles Unified School District

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13  
14           Dated: October 10, 2019

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17           /s/ Carol Federighi  
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**FILER'S ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), regarding signatures, I hereby attest that concurrence in the filing of this document has been obtained from all signatories above.

Dated: October 10, 2019

/s/ R. Matthew Wise  
R. MATTHEW WISE

**[~~PROPOSED~~] ORDER**

**PURSUANT TO STIPULATION,**

Upon consideration thereof, and good cause appearing, it is hereby ORDERED that the deadline to file any motion for attorneys' fees and the deadlines to file any objections to Plaintiffs' filed bills of costs (ECF Nos. 241 and 243) are hereby extended to October 18, 2019.

**IT IS SO ORDERED.**

DATED: 10/11/2019

  
\_\_\_\_\_  
HON. RICHARD SEEBORG  
United States District Court Judge